

**DENTAL BOARD OF CALIFORNIA  
INITIAL STATEMENT OF REASONS**

Hearing Date: May 14, 2004

Subject Matter of Proposed Regulations: Requirements for RDH Educational Programs

Section Affected: 1072.1

Specific Purpose of each adoption, amendment, or repeal:

The proposed changes are intended to increase the likelihood that students in Dental Board-approved dental hygiene educational programs will actually complete the program and enter the workforce, providing greater access to care for California consumers. Specifically, the proposed changes would specify that:

- (1) admission must be based on the applicant's ability to successfully complete the program, based on previous academic performance and/or performance on standardized national tests of scholastic aptitude;
- (2) applicants must have earned certain grade point averages in science prerequisite courses and in general prerequisite courses;
- (3) applicants must have completed the science prerequisite courses within five years immediately preceding application to the program;
- (4) applicants must demonstrate competency in critical thinking skills or demonstrate competence by passing a valid test or class in critical thinking; and,
- (5) applicant prerequisites must include English 1, Speech 1, Sociology 1, Psychology 1, Anatomy, Physiology, Inorganic Chemistry, and Biochemistry.

Factual Basis

Existing regulations provide only vague directives that admission to RDH educational programs shall be based on estimates of capacity for success. The Underlying Data relied upon indicates that past studies have shown that the proposed changes specifying grade point averages, demonstration of critical thinking skills, and defining subject matter prerequisites, would improve the likelihood that an applicant will complete the program.

A March, 2004, survey of existing RDH educational programs in California shows that there are approximately 1,963 applicants for 316 vacant positions in such educational programs each year. During the last two years, 115 students failed, dropped out, or held back, which are positions that most likely would have been filled by more qualified and/or motivated applicants had the proposed criteria been in place.

Improving the likelihood that applicants will complete the program will result in more hygienists entering the workforce to provide services to California consumers.

**Subdivision (g)(3) of the proposed language appears differently than displayed on the website of the Office of Administrative Law (OAL), although no changes to that subdivision are being proposed. Apparently a formatting error occurred in the published version at some time and has never been corrected. A publication of the Dental Practice Act with Rules and Regulations of the Dental Board issued in 1986 portray the list of curriculum content correctly, and no changes to the regulation have been made since that date. However, OAL's website lists the curriculum content in an incorrect manner, reading the material from left to right instead of in columns.**

#### Underlying Data

1. "Rationale for Changing the DPA Rules and Regulations, 1072.1", California Dental Hygiene Educators' Association and Dental Hygiene Program Directors.
2. "Survey of Community College RDH Educational Programs, March, 2004"
3. "Dental Practice Act with Rules and Regulations", Board of Dental Examiners, 1986
4. Website of the Office of Administrative Law displaying Section 1072.1, [http://ccr.oal.ca.gov/cgibin/om\\_isapi.dll?clientID=437986&E22=title%2016&E23=1072.1&E24=&infobase=ccr&querytemplate=%261.%20Go%20to%20a%20Specific%20Section&record={43A03}&softpage=Browse\\_Frame\\_Pg42](http://ccr.oal.ca.gov/cgibin/om_isapi.dll?clientID=437986&E22=title%2016&E23=1072.1&E24=&infobase=ccr&querytemplate=%261.%20Go%20to%20a%20Specific%20Section&record={43A03}&softpage=Browse_Frame_Pg42)

#### Business Impact

The proposed changes would not have any impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Dental Board of California would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.